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2007 MAY -4 A 11: 40

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6 **Stephanie J. Gliege (#022465)**  
7 **Attorneys for the Complainants**

**AZ CORP COMMISSION**  
**DOCUMENT CONTROL**

**BEFORE THE ARIZONA CORPORATION COMMISSION**

8 **RAYMOND R. PUGEL AND JULIE B.**  
9 **PUGEL, husband and wife as trustees of THE**  
10 **RAYMOND R. PUGEL and JULIE B. PUGEL**  
11 **FAMILY TRUST,**

**DOCKET NO. W-03512A-06-0407**

12 **and**  
13 **ROBERT RANDALL and SALLY RANDALL,**  
14 **husband and wife**

**MOTION TO CONSOLIDATE**

15 **Complainants,**  
16 **v.**  
17 **PINE WATER COMPANY, an Arizona**  
18 **Corporation**  
19 **Respondent..**

20 **ASSET TRUST MANAGEMENT, CORP.**  
21 **Complainants,**

**DOCKET NO. W-03512A-06 -0613**

22 **v.**  
23 **PINE WATER COMPANY, an Arizona**  
24 **Corporation**  
25 **Respondent.**

**MOTION TO CONSOLIDATE**

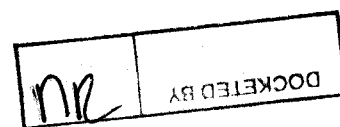
26 **JAMES HILL and SIOUX HILL, husband and**  
27 **wife and as trustees of THE HILL FAMILY**  
28 **TRUST,**

**DOCKET NO. W-03512A-07-0100**

29 **Complainants,**

**MOTION TO CONSOLIDATE**

30 **v.**  
31 **PINE WATER COMPANY, an Arizona**  
32 **Corporation**  
33 **Respondent.**



**DOCKETED**  
**Arizona Corporation Commission**  
**MAY -4 2007**

1 COMES NOW, Brent Weekes docket no. W-03512A-07-0019, by and through his attorney  
2 undersigned and respectfully moves the Court to consolidate the four above captioned cases, pursuant to  
3 **Rule 42(a) of Arizona Rules of Civil Procedure**, on the grounds and for the reasons that these cases  
4 contain common issues of fact and questions of law and in the interest of judicial economy should be  
5 resolved as one case. Even more because the consolidation of the cases will have a determinative impact  
6 on all of the Complainants as the matters are highly related. This Motion is supported by the attached  
7 Memorandum of Points and Authorities.

8 RESPECTFULLY SUBMITTED this 3<sup>rd</sup> day of May, 2007.

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10 GLIEGE LAW OFFICES, PLLC

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13 John G. Gliege  
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1 Original and 19 copies mailed/delivered  
2 This \_\_\_\_ day of \_\_\_\_\_, 2007 to:

3 Arizona Corporation Commission  
4 Attn: Docket Control  
5 1200 W. Washington  
6 Phoenix, AZ 85007

7 Copies of the foregoing mailed/delivered  
8 This \_\_\_\_ day of \_\_\_\_\_, 2007 to:

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## MEMORANDUM OF POINTS AND AUTHORITIES

The four cases before the Court arise out of the same initial fact situation. ASSET TRUST MANAGEMENT CORP., RAYMOND R. PUGEL AND JULIE B. PUGEL, husband and wife as trustees of THE RAYMOND R. PUGEL and JULIE B. PUGEL FAMILY TRUST, and ROBERT RANDALL and SALLY RANDALL, husband and wife, and JAMES HILL and SIOUX HILL, husband and wife and as trustees of THE HILL FAMILY TRUST have filed *Application(s) For Deletion Of Territory From Certificate Of Convenience And Necessity Of Pine Water Company*. The complainant BRENT WEEKES has filed an *Application For Deletion Of Territory From Certificate Of Convenience And Necessity Of Pine Water Company*. All of these cases are under consideration before the Arizona Corporation Commission. As of the date hereof, the Arizona Corporation Commission has taken no action on the case. Therefore these actions are still pending. Furthermore, complainant, BRENT WEEKES, is willing and able to proceed with the procedural schedule already set by this Commission.

BRENT WEEKES contends that issues in these four cases are related and are before this same Court, and that it is duplicative of effort to have two separate trials in these cases.

Therefore, BRENT WEEKES respectfully requests, that on the grounds of common issues of fact and questions of law, the similar parties involved, and in the interests of judicial economy, the Court consolidate the above captioned cases in this matter.

RESPECTFULLY SUBMITTED this 3rd day of May, 2007.

LAW OFFICE OF JOHN G. GLIEGE

  
\_\_\_\_\_  
John G. Gliege